

nrCS

N438

**From:** Karlglasener@cs.com  
**Sent:** Tuesday, October 05, 2004 1:43 PM  
**To:** FarmBillRules  
**Cc:** Karlglasener@cs.com  
**Subject:** Comments Cons Security Program Interim Final Rule  
**Attachments:** ATTACHMENT.TXT; CSP Comments Final Oct 5 Deadline.doc

Dear Dr. Derickson,

Pasted into the body of this email (scroll down) and attached as a MSWORD document are the comments from the American Society of Agronomy, Crop Science Society of America, Soil Science Society of America in response to the June 21, 2004 Conservation Security Program Interim Final Rule and Notice. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Karl Glasener  
 Director of Science Policy  
 American Society of Agronomy  
 Crop Science Society of America  
 Soil Science Society of America  
 900 2nd Street, NE, Suite 205  
 Washington, DC 20002  
 Phone: 202-408-5382; Fax 5385  
 Email: Karlglasener@cs.com

\*\*\*\*\*

October 5, 2004

Craig Derickson  
 Conservation Security Program Manager  
 Financial Assistance Programs Division  
 Planning Team Leader  
 Natural Resources Conservation Service  
 P.O. Box 2890  
 Washington, DC 20013-2890  
 Email: FarmBillRules@usda.gov  
 Attn: Conservation Security Program

Re: Comments on 7 CFR Part 1469, Conservation Security Program: Interim Final Rule and Notice, published in the Federal Register on June 21, 2004, (Volume 69, No. 118, pp. 34502-34532).

To Whom It May Concern:

The American Society of Agronomy, Crop Science Society of America, Soil Science Society of America appreciate the opportunity to comment on the Conservation Security Program: Interim Final Rule and Notice. Our scientists have reviewed the proposed interim final rule and have comments as follows:

The overall documentation is much clearer than before, both because of a better presentation, seemingly better order, plus the fact that some changes needed were made. Considering the large number of comments received, and an overall feeling that NRCS did not make as many changes as it should have, we were tempted to count the number of times NRCS stated "We made no changes based on these comments." We did not. Perhaps the improvement in the rules is our own better understanding, inasmuch that since the first review of CSP proposed rules, we have reviewed the Grassland Conservation Program (GRP) and submitted comments, and also through an Advisory Council we are involved with checking out the Conservation Innovation Grant program. The interlinking and the necessity of bridging among the many programs added to the NRCS responsibilities is real. Hopefully, this coordination will minimize misuse among clients as they scamper for the additional monetary supports of conservation practices, more that one of which need refining and study. It seems to us that more subcontracting to able

individuals, institutions, and organizations could verify important needs helping to assure that trends to conservation will be adequately funded in the future.

N438

In the OVERVIEW at the beginning of the document, there is considerable justification of NRCS viewpoints to make the program operative, and to take what appropriations they receive. It seems to be a sensible alternative inasmuch as NRCS now gets an opportunity to nail down the priority watershed approach, not the least being able to use CSP monies to get something done. NRCS has been no doubt thinking about for a long time. How NRCS will quantify the benefits that will be shown by, e.g., a Tier 3 enrollee in CSP, one already having had previous benefits. It seems to us that a new Tier 1 enrollee is in greater need, and will show more bang for the buck. We are hopeful that the program will include unsung heroes of conservation out on the land in the days ahead. The revisions in the document are hazy on this.

Several of the issues that we have commented on either in the earlier CSP Comments, or in the GRP Comments, have been considered. We have not read the legislation(s) about these programs. If there is non conformity there enough to agitate future appropriations downward to either CSP or GRP, and excessive volatility in appropriation expenditures among programs as a result, it may make it necessary that NRCS be so cautioned from a higher authority.

We read all of the present document completely through, then studied back more than once, and decided to evaluate on the basis of what NRCS had done in response to comments received before. On page 34502, NRCS's explanations begins on comments in six areas, namely;

- (1) the administration's response to legislative intent;
- (2) the watershed approach and enrollment categories;
- (3) the minimum stewardship eligibility requirements;
- (4) the funding and payment rates;
- (5) the definition of agricultural operation;
- (6) locally led conservation.

The administration's response to legislative intent

Not having read the legislation, we defer to others with more knowledge on this issue. In the document there is a forthright explanation of why NRCS will proceed with less complaining and excuse making about the shortage of money provided.

The watershed approach and enrollment categories

We don't think this is going to be reversed regardless of what we might think or write. We thought it was all set before, now NRCS is talking about priority watershed definitions, i.e., to shim up how NRCS is going to define them. The way we think, the watersheds most in need must have already been allotted/have dispensed considerable cost sharing, such that they now have Tier 2's and Tier 3's to count on. So, where the spending has already occurred, the limited spending so far of CSP will go there. Not much new about that.

At the top of page 34507, upper left hand corner, there is explanation about rewarding those having done a good job. We want to emphasize as much as we can that those having done a good job get included, not just the ones that have been the recipients of cost sharing already.

We appreciate the first full paragraph, first column, page 34508. There is recognition, at least, that grasslands are unique and deserve attention, technical assistance, and reward along with all of the row cropping in this country. We suspect that grasslands fitting into this program and augmenting row cropping in conservation systems will under the bridging/portfolio approach end up in contracts under GRP, even though they are (or should be) foundations of conservation in many row cropping systems and, therefore, can continue to be the foundation in many cases.

The minimum stewardship eligibility requirements

The reduction factor for Tier 1 is too severe. Here follows a scenario, that may in itself be inaccurate or based on questionable assumptions. There is thought behind it. Basically, we have stated it before, grassland based farming has not had a decent shake as compared with land in intensive row cropping. There are benefits accruing to permanent perennial cover situations that have not been fully appreciated, in our estimation.

How can you expect to add benefits to the lower end? Can a new potential cooperator that has been doing a good "conservation" job all along go immediately to Tier 2 or have a chance to qualify for Tier 3? NO !! It is ironical that a farmer, e.g., a good humble grasslander) having done it with grassland farming, now needing to make an inventory, and that he/she will do it in a humble way and likely underrate as to what has been done. How many of them have enough records to document what has been done to go up against the "pros" in knowing how to get the most support, and the most cost sharing? We say help those who have done a good job, whether they shout about it or not, and help them to be the examples, rather than the ones that have been farming and at every turn been trying to get in on whatever program is presently being pushed.

N438

The funding and payment rates

We do not agree that Tier 1 participants should take a greater hit on stewardship payments via the reduction factor than Tier 2 and Tier 3 participants do.

The definition of agricultural operation

No comment.

Locally led conservation

Absolutely needed to get programs into farming communities to keep the wider public more aware of how it all works, how they can be supportive, and how they can and will help.

Additional Comments:

Page 34510, column 1, paragraph 3:  
Leave as it is, it is just the cost of business of changing to pasture.

Page 34512, column 3, paragraph 1:  
Let them add land so that conservation will be encouraged if funds are available.

Page 34517, column 1, paragraph 2:  
180 days should be satisfactory for this year and future years. The October 5, 2004 date seems early, especially since it is the first year of the program.

Page 34518, column 2, paragraph 3:  
NRCS should give the final approval. The TSP's could aid in preparing a list and planning the conservation activities.

\*\*\*\*\*

Karl M. Glasener  
Director of Science Policy  
American Society of Agronomy  
Crop Science Society of America  
Soil Science Society of America  
900 2nd Street, NE, Suite 205  
Washington, DC 20002  
Phone: 202-408-5382; Fax 5385  
Email: [Karlglasener@cs.com](mailto:Karlglasener@cs.com)  
[www.agronomy.org](http://www.agronomy.org), [www.crops.org](http://www.crops.org), [www.soils.org](http://www.soils.org)  
View and subscribe to Science Policy Report  
[www.asa-cssa-sssa.org/policy/](http://www.asa-cssa-sssa.org/policy/)